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VIA ECF

The Honorable Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

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Re: *Tavarez-Vargas v. Project 7, Inc.*
Case No. 1:21-cv-10392-AT-GWG

Dear Judge Torres:

We represent defendant Project 7, Inc. in this case. We write, pursuant to Rule I(C) of Your Honor's Individual Practices in Civil Cases and with Plaintiff's counsel's consent, to respectfully request an extension of time for Project 7 to answer, move, or otherwise respond to the Complaint and an extension of time for the parties to submit their joint letter and joint proposed Case Management Plan.

As we have reported to the Court in prior correspondence, the parties have been in the process of communicating regarding a potential resolution, which would obviate the need for further intervention by the Court. Those communications continued as recently as this afternoon. Significant progress has been made, and the parties respectfully request additional time to conclude their discussions.

Project 7's response to the complaint is presently due March 21, 2022, and the parties' joint letter and joint proposed Case Management Plan are presently due March 28, 2022. We respectfully request an extension of thirty (30) days to April 20, 2022 for Project 7 to respond to the Complaint and an attendant extension to April 27, 2022 for the parties to submit their joint letter and joint proposed Case Management Plan to allow time for the parties to continue and hopefully conclude their ongoing discussions and so as to not jeopardize the progress they have made thus far. This represents Project 7's fourth request for an extension of its time to respond to the Complaint and its third request for an extension of time for the parties to submit their joint letter and joint proposed Case Management Plan. The prior requests, also upon consent, were granted. The requested extensions will not affect any other scheduled date.

GRANTED.

SO ORDERED.

Dated: March 22, 2022
New York, New York



ANALISA TORRES
United States District Judge